

**EXHIBIT A**

**From:** [Bender, Kristin](#)  
**To:** [Kevin A. Fritz](#)  
**Cc:** [Jason Sunshine](#); [Gottlieb, Michael](#); [Governski, Meryl Conant](#); [Nathan, Aaron E.](#); [Hudson, Esra](#); [Roeser, Stephanie](#); [Sigrid McCawley](#); [lruff@bsflp.com](#); [Andrew Villacastin](#); [kristintahler@quinnemanuel.com](#); [maarenschah@quinnemanuel.com](#); [nicholasinns@quinnemanuel.com](#); [Bryan Freedman](#); [Theresa Troupson](#); [Summer Benson](#); [Miles Cooley](#); [Mitch Schuster](#); [Amit Shertzer](#); [Cortni Davis](#); [Jose Perez](#); [Vaneta Birtha](#); [mitra@ahouraianlaw.com](#)  
**Subject:** RE: Lively v. Wayfarer Studios LLC et al., No. 1:24-cv-10049-LJL; Wayfarer Studios LLC et al. v. Lively et al., No. 1:25-cv-00449-LJL  
**Date:** Friday, February 14, 2025 2:01:41 PM  
**Attachments:** [image001.png](#)

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Hi Kevin,

To reiterate our call just now, we asked you to provide legal authority to support your position with respect to the phone carrier subpoenas. You refused to do so and said you would provide authority to the Court. We are again requesting that you provide such authority to us before filing anything with the Court so that we may meaningfully meet and confer. We do not think your demand that we immediately withdraw the subpoenas while the meet and confer process is ongoing is appropriate, nor do we anticipate that the just-served carriers will produce the records early, prior to the opportunity to review any legal authority for your position. However, to allow for the necessary time to consider any cases you have in support of the Wayfarer Parties' position, in the highly unlikely event that documents are produced in connection with the subpoenas in advance, we can agree as officers of the Court not to access or review the materials until the parties' meet and confer process is completed.

Best,  
Kristin

**Kristin Bender**  
**Willkie Farr & Gallagher LLP**  
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---

**From:** Kevin A. Fritz <kaf@msf-law.com>  
**Sent:** Friday, February 14, 2025 3:25 PM  
**To:** Bender, Kristin <KBender@willkie.com>  
**Cc:** Jason Sunshine <jsunshine@lftcllp.com>; Gottlieb, Michael <MGottlieb@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>; Nathan, Aaron E. <ANathan@willkie.com>; ehudson@manatt.com; sroeser@manatt.com; Sigrid McCawley <smccawley@bsflp.com>; lruff@bsflp.com; Andrew Villacastin <AVillacastin@bsflp.com>; kristintahler@quinnemanuel.com; maarenschah@quinnemanuel.com; nicholasinns@quinnemanuel.com; Bryan Freedman <bfreedman@lftcllp.com>; Theresa Troupson <ttroupson@lftcllp.com>; Summer Benson

<sbenson@lftcllp.com>; Miles Cooley <mcooley@lftcllp.com>; Mitch Schuster <ms@msf-law.com>; Amit Shertzer <as@msf-law.com>; Cortni Davis <cdavis@lftcllp.com>; Jose Perez <jperez@lftcllp.com>; Vaneta Birtha <vbirtha@lftcllp.com>; mitra@ahouraianlaw.com  
**Subject:** RE: Lively v. Wayfarer Studios LLC et al., No. 1:24-cv-10049-LJL; Wayfarer Studios LLC et al. v. Lively et al., No. 1:25-cv-00449-LJL

\*\*\* EXTERNAL EMAIL \*\*\*

For anyone who wants to join: conference Number 267-930-4000,, 170343230#



**Kevin A. Fritz**

Partner

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---

**From:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>

**Sent:** Friday, February 14, 2025 3:23 PM

**To:** Kevin A. Fritz <[kaf@msf-law.com](mailto:kaf@msf-law.com)>

**Cc:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>; Gottlieb, Michael <[MGottlieb@willkie.com](mailto:MGottlieb@willkie.com)>; Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>; Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>; [ehudson@manatt.com](mailto:ehudson@manatt.com); [sroeser@manatt.com](mailto:sroeser@manatt.com); Sigrid McCawley <[smccawley@bsfllp.com](mailto:smccawley@bsfllp.com)>; [lruff@bsfllp.com](mailto:lruff@bsfllp.com); Andrew Villacastin <[AVillacastin@bsfllp.com](mailto:AVillacastin@bsfllp.com)>; [kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com); [maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com); [nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com); Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Miles Cooley <[mcooley@lftcllp.com](mailto:mcooley@lftcllp.com)>; Mitch Schuster <[ms@msf-law.com](mailto:ms@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Jose Perez <[jperez@lftcllp.com](mailto:jperez@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com)

**Subject:** RE: Lively v. Wayfarer Studios LLC et al., No. 1:24-cv-10049-LJL; Wayfarer Studios LLC et al. v. Lively et al., No. 1:25-cv-00449-LJL

**CAUTION:** This is an external email. DO NOT click links or open attachments unless you can confirm the sender and know the content is safe.

Sounds good, I'll give you a call then.

Best,  
Kristin

**Kristin Bender**  
**Willkie Farr & Gallagher LLP**  
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**From:** Kevin A. Fritz <[kaf@msf-law.com](mailto:kaf@msf-law.com)>  
**Sent:** Friday, February 14, 2025 3:14 PM  
**To:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>  
**Cc:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>; Gottlieb, Michael <[MGottlieb@willkie.com](mailto:MGottlieb@willkie.com)>; Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>; Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>; [ehudson@manatt.com](mailto:ehudson@manatt.com); [sroeser@manatt.com](mailto:sroeser@manatt.com); Sigrid McCawley <[smccawley@bsfllp.com](mailto:smccawley@bsfllp.com)>; [lruff@bsfllp.com](mailto:lruff@bsfllp.com); Andrew Villacastin <[AVillacastin@bsfllp.com](mailto:AVillacastin@bsfllp.com)>; [kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com); [maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com); [nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com); Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Miles Cooley <[mcooley@lftcllp.com](mailto:mcooley@lftcllp.com)>; Mitch Schuster <[ms@msf-law.com](mailto:ms@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Jose Perez <[jperez@lftcllp.com](mailto:jperez@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com)  
**Subject:** RE: Lively v. Wayfarer Studios LLC et al., No. 1:24-cv-10049-LJL; Wayfarer Studios LLC et al. v. Lively et al., No. 1:25-cv-00449-LJL

\*\*\* EXTERNAL EMAIL \*\*\*

Thanks. Let's do 4pm.



**Kevin A. Fritz**  
Partner

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---

**From:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>

**Sent:** Friday, February 14, 2025 2:47 PM

**To:** Kevin A. Fritz <[kaf@msf-law.com](mailto:kaf@msf-law.com)>

**Cc:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>; Gottlieb, Michael <[MGottlieb@willkie.com](mailto:MGottlieb@willkie.com)>; Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>; Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>; [ehudson@manatt.com](mailto:ehudson@manatt.com); [sroeser@manatt.com](mailto:sroeser@manatt.com); Sigrid McCawley <[smccawley@bsfllp.com](mailto:smccawley@bsfllp.com)>; [lruff@bsfllp.com](mailto:lruff@bsfllp.com); Andrew Villacastin <[AVillacastin@bsfllp.com](mailto:AVillacastin@bsfllp.com)>; [kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com); [maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com); [nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com); Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Miles Cooley <[mcooley@lftcllp.com](mailto:mcooley@lftcllp.com)>; Mitch Schuster <[ms@msf-law.com](mailto:ms@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Jose Perez <[jperez@lftcllp.com](mailto:jperez@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com)

**Subject:** RE: Lively v. Wayfarer Studios LLC et al., No. 1:24-cv-10049-LJL; Wayfarer Studios LLC et al. v. Lively et al., No. 1:25-cv-00449-LJL

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Hi Kevin,

Further to the below, please advise whether you are available to meet at 3:30 pm est or another time this afternoon that works for you (and any others who would like to join).

Thanks,  
Kristin

**Kristin Bender**

**Willkie Farr & Gallagher LLP**

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---

**From:** Kevin A. Fritz <[kaf@msf-law.com](mailto:kaf@msf-law.com)>

**Sent:** Thursday, February 13, 2025 8:13 PM

**To:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>

**Cc:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>; Gottlieb, Michael <[MGottlieb@willkie.com](mailto:MGottlieb@willkie.com)>; Governski,

Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>; Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>; [ehudson@manatt.com](mailto:ehudson@manatt.com); [sroeser@manatt.com](mailto:sroeser@manatt.com); Sigrid McCawley <[smccawley@bsflp.com](mailto:smccawley@bsflp.com)>; [lruff@bsflp.com](mailto:lruff@bsflp.com); Andrew Villacastin <[AVillacastin@bsflp.com](mailto:AVillacastin@bsflp.com)>; [kristintahler@quinnemanuel.com](mailto:kristintahler@quinnemanuel.com); [maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com); [nicholasinns@quinnemanuel.com](mailto:nicholasinns@quinnemanuel.com); Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Miles Cooley <[mcooley@lftcllp.com](mailto:mcooley@lftcllp.com)>; Mitch Schuster <[ms@msf-law.com](mailto:ms@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Jose Perez <[jperez@lftcllp.com](mailto:jperez@lftcllp.com)>; Vaneta Birtha <[ybirtha@lftcllp.com](mailto:ybirtha@lftcllp.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com)  
**Subject:** Re: Lively v. Wayfarer Studios LLC et al., No. 1:24-cv-10049-LJL; Wayfarer Studios LLC et al. v. Lively et al., No. 1:25-cv-00449-LJL

\*\*\* EXTERNAL EMAIL \*\*\*

Sure, thanks.

Meister Seelig & Fein PLLC

**Kevin A. Fritz**

Partner

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On Feb 13, 2025, at 7:51 PM, Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)> wrote:

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Thanks, Kevin.

Unfortunately I am in a deposition tomorrow but am doing my best to accommodate this request within the 48-hour window despite the holiday. If it ends early, I can let you know, does that work?

Best,  
Kristin

—  
On February 13, 2025 at 7:28:13 PM EST, Kevin A. Fritz <[kaf@msf-law.com](mailto:kaf@msf-law.com)> wrote:

**\*\*\* EXTERNAL EMAIL \*\*\***

Kristin:

I'm referencing the subpoenas to AT&T, Verizon and T-Mobile. With respect to your suggestion that we meet and confer at 6pm on February 14, that is the evening of Valentine's Day and the eve of a long weekend. Are you available at any time prior to 3pm EST?

Meister Seelig & Fein PLLC

**Kevin A. Fritz**

Partner

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**Kristin Bender**  
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[kbender@willkie.com](mailto:kbender@willkie.com) | [vCard](#) | [www.willkie.com bio](http://www.willkie.com/bio)

On Feb 13, 2025, at 3:03 PM, Bender, Kristin  
<[KBender@willkie.com](mailto:KBender@willkie.com)> wrote:

**CAUTION:** This is an external email. DO NOT click links or open attachments unless you can confirm the sender and know the content is safe.

Hi Kevin,

Please identify which subpoenas you're referencing. We are available to connect tomorrow at 6 pm est regarding your objections as well as the proposed protective order.

Thanks,  
Kristin

**Kristin Bender**  
**Willkie Farr & Gallagher LLP**  
1875 K Street, N.W. | Washington, DC 20006-1238  
Direct: [+1 202 303 1245](tel:+12023031245) | Mobile: [+1 703 732 4995](tel:+17037324995)  
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**From:** Kevin A. Fritz <[kaf@msf-law.com](mailto:kaf@msf-law.com)>  
**Sent:** Wednesday, February 12, 2025 9:56 PM  
**To:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>  
**Cc:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>; Gottlieb, Michael <[MGottlieb@willkie.com](mailto:MGottlieb@willkie.com)>; Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>; Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>; [ehudson@manatt.com](mailto:ehudson@manatt.com); [sroeser@manatt.com](mailto:sroeser@manatt.com); Sigrid McCawley



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[maarenschah@quinnemanuel.com](mailto:maarenschah@quinnemanuel.com);  
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<[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; Miles Cooley <[mcooley@lftcllp.com](mailto:mcooley@lftcllp.com)>;  
Mitch Schuster <[ms@msf-law.com](mailto:ms@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Jose Perez  
<[jperez@lftcllp.com](mailto:jperez@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>;  
[mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com)

**Subject:** Re: Lively v. Wayfarer Studios LLC et al., No. 1:24-cv-10049-LJL; Wayfarer Studios LLC et al. v. Lively et al., No. 1:25-cv-00449-LJL

\*\*\* EXTERNAL EMAIL \*\*\*

Kristin:

Pursuant to the Judge's Rules, please let us know when you are available to telephonically meet and confer, within the next 48 hours, concerning our objections to your subpoenas. Thank you.

Meister Seelig & Fein PLLC

**Kevin A. Fritz**

Partner

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On Feb 12, 2025, at 12:02 AM, Bender, Kristin  
<[KBender@willkie.com](mailto:KBender@willkie.com)> wrote:

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Counsel:

Please see the attached notices for subpoenas relating to the above-captioned matters.

Best,  
Kristin

Kristin Bender  
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From: Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>  
Sent: Tuesday, February 11, 2025 7:38 PM  
To: Gottlieb, Michael <[MGottlieb@willkie.com](mailto:MGottlieb@willkie.com)>;

Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>; Governski,  
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Subject: Lively v. Wayfarer Studios LLC et al., No.  
1:24-cv-10049-LJL; Wayfarer Studios LLC et al. v.  
Lively et al., No. 1:25-cv-00449-LJL

\*\*\* EXTERNAL EMAIL \*\*\*

Counsel:

Please take notice of the attached subpoena in the  
above-captioned matters.

Thanks,  
Jason

Jason H. Sunshine, Esq.  
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